



Zep Inc.  
Research & Development  
1420 Seaboard Industrial Blvd  
Atlanta GA 30318

Phone: 404.352.1680  
Fax: 404.350.6218

[www.zep.com](http://www.zep.com)

July 11<sup>th</sup>, 2012

Document Processing Desk (DCI/AD)  
ATTN: Reevaluation Team Leader, PM 36  
U.S. Environmental Protection Agency (7510P)  
One Potomac Yard (South Building)  
2777 South Crystal Drive  
Arlington, VA 22202-4501

SUBJECT: RESPONSES TO HYDROGEN PEROXIDE DATA CALL-IN ID # GDCI-000595-1127

Dear Reevaluation Team Leader

Zep, Inc (EPA # 1270) received the Generic Data Call in Notice # GDCI-000595-1127. The DCI requires registrants to respond within 90 days of receipt of the Notice. As such, this letter and its attachments constitute Zep's response to the data requirements of the Notice GDCI-000595-1127.

Zep has entered an agreement to share in the cost to develop data. We are a current member, in good standing, of the Keller and Heckman Peroxy Compounds Task Force. The group is involved in negotiation of compensation for existing studies, writing waivers for studies not applicable or feasible, and/or generating data in support of this and/or other registrations.

For Guideline Requirement Number SS-1138, we are requesting a waiver of data, as this is not applicable to our enclosed pesticide label.

Please find the following attachments in support of this response:

1. Completed "Data Call-In Response" form
2. Complete "Requirements Status and Registrant's Response" forms.
3. Letter stating membership in the Peroxy Compounds Task Force

Please do not hesitate to contact if there are any questions or issues with the responses, I may be contacted directly at (404) 603-7668. Thank you.

Sincerely,

Kyanne L. Morris  
Senior Chemist  
Compliance Services  
Zep, Inc.  
Email: [kyanne.morris@zep.com](mailto:kyanne.morris@zep.com)

United States Environmental Protection Agency  
Washington, D.C. 20460  
**DATA CALL-IN RESPONSE**

OMB Approval 2070-0174

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.  
Use additional sheet(s) if necessary.

1. Company Name and Address ZEP INC. 1310 SEABOARD INDUSTRIAL BLVD. ATLANTA, GA 30318		2. Case # and Name 4072 - Hydrogen peroxide Chemical # and Name: 000595 Hydrogen peroxide		3. Date and Type of DCI and Number 22-Feb-2012 GENERIC ID # GDCI-000595-1127	
4. EPA Product Registration	5. I wish to cancel this product registration voluntarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data Requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirement on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirement on the attached form entitled "Requirements Status and Registrant's Response."
1270-257			✓	N/A	N/A
8. Certification: I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.					9. Date
Signature and Title of Company's Authorized Representative <u>William Morris</u> Senior Chemist					6/29/2012
10. Name of Company <u>Zep, Inc</u>					11. Phone Number <u>404-2603-7068</u>

United States Environmental Protection Agency  
Washington, D.C. 20460

**REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE**

OMB Approval 2070-0174

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address  ZEP INC. 1310 SEABOARD INDUSTRIAL BLVD. ATLANTA, GA 30318		2. Case # and Name  4072 - Hydrogen peroxide Chemical # and Name: 000595 Hydrogen peroxide			3. Date and Type of DCI and Number  22-Feb-2012 GENERIC ID # GDCI-000595-1127				
4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
	<b>Applicator Exposure Data Requirements (Conventional Chemical)</b>								
875.1400	Inhalation exposure--indoor	N				V,Y,T,DD,Z,S,U,R,X	TEP	12	2
875.1600	Application exposure monitoring data reporting	N				V,Y,T,DD,Z,S,U,R,X	TEP	12	2
875.1700	Product Use Information	N				V,Y,T,DD,Z,S,U,R,X	TEP	12	2
	<b>Nontarget Plant Protection Data Requirements (Conventional Chemical)</b>								
850.4400	Aquatic plant toxicity test using Lemna spp. Tiers I and II	N				V,Y,T,DD,Z,S,U,R,X	TEP; TGAI	12	2
850.5400	Algal toxicity, Tiers 1 and II (2)	N				V,Y,T,DD,Z,S,U,R,X	TEP; TGAI	12	2
	<b>Post-Application Exposure Data Requirements (Conventional Chemical)</b>								
875.2500	Inhalation exposure	N				V,Y,T,DD,Z,S,U,R,X	TEP	12	2
875.2800	Description of human activity	N				V,Y,T,DD,Z,S,U,R,X	TEP	12	2
10. Certification: I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.							11. Date  6/29/2012		
Signature and Title of Company's Authorized Representative <u>Kyrene Hollis Senior Chemist</u>									
12. Name of Company <u>Zep, Inc.</u>							13. Phone Number <u>404-603-7068</u>		

United States Environmental Protection Agency  
Washington, D.C. 20460

OMB Approval 2070-0174

**REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE**

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4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
875.2900	<b>Post-Application Exposure Data Requirements (Conventional Chemical)</b>  Data reporting and calculations	N				V.Y.T,DD,Z.S,U,R,X	TEP	12	2
830.7860	<b>Product Chemistry Data Requirements (Conventional Chemical)</b>  Water solubility, generator column method	N				V.Y.T,DD,Z.S,U,R,X	MP; TGAI	8	2
850.1035	<b>Terrestrial and Aquatic Nontarget Organisms Data Requirements (Conventional Chemical)</b>  Mysid acute toxicity test	N				V.Y.T,DD,Z.S,U,R,X	TEP; TGAI	12	2
870.3465	<b>Toxicology Data Requirements (Conventional Chemical)</b>  90-day inhalation toxicity	N				V.Y.T,DD,Z.S,U,R,X	TGAI	24	2
835.1110	Activated sludge sorption isotherm	N				V.Y.T,DD,Z.S,U,R,X	TGAI	12	2
RM 6/29/12									

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4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
835.3110	Ready biodegradability	N				V,Y,T,DD,Z,S,U,R,X	TGAi	12	2
850.6800	Modified Activated Sludge Respiration Inhibition	N				V,Y,T,DD,Z,S,U,R,X	TGAi	12	2
SS-1138	Acute Effects Monitoring Data from a Harbor Where Ballast Water is Released	(1) Y				V,Y,T,DD,Z,S,U,R,X	TGAi	24	9
							KM 6/29/12		

1001 G Street, N.W.  
Suite 500 West  
Washington, D.C. 20001  
tel. 202.434.4100  
fax 202.434.4646

June 29, 2012

**U.S. First Class Mail**

Ms. Wanda Henson  
U.S. Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Ave., N.W.  
Mail Code: 7510P  
Washington, DC 20460

Writer's Direct Access  
**David G. Sarvadi**  
(202) 434-4249  
Sarvadi@khilaw.com

Re: Responses to EPA's Data Call-In for Peroxy Compounds; GDCI-000595-1127,  
GDCI-063201-1125

Dear Ms. Henson:

We are writing to provide the Environmental Protection Agency (EPA) to amend the list of members in good standing of the Peroxy Compounds Task Force (PCTF). The members have agreed to work together to submit data required by EPA to satisfy the data requirements for hydrogen peroxide (chemical number 0595, GDCI-063201-1127) and peracetic acid (chemical number 063201, also known as ethaneperoxoic acid, GDCI-063201-1125). Zep Inc. has joined the PCTF.

An updated list of members is as follows:

- A Growing Alternative, Inc.
- Arkema Inc.
- Betco Corp. LTD
- Binary Ionization Incorporated
- BioMed Protect LLC
- BioNeutral Group, Inc.
- Biosafe Systems LLC
- Diversey, Inc. Sealed Air
- Earth Laboratories, Inc.
- Ecolab, Inc.
- EkO Peroxide LLC.
- EnviroTech Chemical Services, Inc.
- Envirox LLC
- Evonik Degussa Corporation

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- FMC Corporation
- Innovasource LLC
- Kimberly-Clark Corporation
- Mason Chemical Company
- Minntech Corporation
- Reckitt Benckiser LLC
- Solvay Chemicals, Inc.
- Sterilex Corporation
- Steris Corporation
- The Procter & Gamble Company
- Veltek, Inc
- Virox Technologies Inc.
- Zep Inc.

Keller and Heckman LLP is counsel to the PCTF.

We continue to work with EPA to resolve questions that bear on how the group will provide data to satisfy EPA's data requirements. As always, please contact me if you have any questions.

Respectfully submitted,



David G. Sarvadi